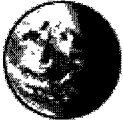


PCS/13/10
#8.a.



"Gary G. Mapa"
<gmapa@reatta.com>
05/12/2010 10:32 AM

To <tom.dougherty@edcgov.us>
cc "Gary G. Mapa" <gmapa@reatta.com>, "Jon Rosenhack"
<JRosenhack@sbsite.com>, "Jason Laskey"
<JLaskey@sbsite.com>, "Paul Albritton"
<pa@mallp.com>
bcc
Subject Chamber of Commerce Support Letter RE: S09-0015/SBA
Cellular Telecommunications Facility-Garden Valley Agenda
May 13, 2010

Hi Tom;

I met with the Coloma Lotus Chamber of Commerce last night at its May meeting. I had requested to be placed on its agenda to discuss the Project and offer a question and answer session. Site selection was specifically addressed by me as I wanted to give the Chamber full knowledge of Neighborhood concerns. I believe this testimony is significant for the Commissioner's review and formally request that hard copies be made available to each Commissioner and others as you feel necessary. Thanks Tom, and as always, please do not hesitate to call or email with any questions or comments.

*Gary G. Mapa
Site Acquisition Resultants, Inc.
Real Estate Solutions
PO Box 621
Applegate, CA 95703
530-320-9097 (Cell)
530-878-7260 (Fax)*

gmapa@reatta.com

WWW.SARSAS.ORG

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Verizon Endorsement Letter Chamber of C.pdf



COLOMA-LOTUS
CHAMBER OF COMMERCE

Coloma-Lotus Chamber of Commerce
PO Box 608
Coloma, CA 95613

5/11/2010

Planning Commission
County of El Dorado Development Services

To whom it may concern:

The Coloma-Lotus Chamber of Commerce is in unanimous support of the proposed cellular tower by SBA/Verizon Wireless on Sagebrush Road in Garden Valley. The enhanced wireless services that this tower will bring to the greater Coloma, Lotus and Highway 49 corridor is essential to our business development, community services, and public safety systems.

We support this proposal because SBA and Verizon Wireless have taken into account the scenic view shed of the Coloma-Lotus Valley as well as the community's aesthetic construction requests.

It is strongly believed that this project will benefit the overall economic and public safety of the community. We support the project fully.

Sincerely,

Howard Penn
President
Coloma-Lotus Chamber of Commerce
530-626-8096

PC 5/13/10
#8a

10 MAY 12 PM 2:44
RECEIVED
PLANNING DEPARTMENT

MACKENZIE & ALBRITTON LLP

423 WASHINGTON STREET, SIXTH FLOOR
SAN FRANCISCO, CALIFORNIA 94111

TELEPHONE 415 / 288-4000
FACSIMILE 415 / 288-4010

May 11, 2010

VIA ELECTRONIC MAIL

Lou Rain, Chair
Dave Pratt, First Vice-Chair
Tom Heflin, Second Vice-Chair
Commissioners Walter Mathews and Alan Tolhurst
Planning Commission
El Dorado County
2850 Fairlane Court, Placerville, CA 95667

Re: S09-0015 Special Use Permit for Wireless Telecommunications Tree Pole at 5080 Sagebrush Road, Garden Valley. Recommended Approval Agenda Item 8, May 13, 2010

Dear Chair Rain and Members of the Commission:

We write to you on behalf of our client SBA Network Services, Inc. ("SBA") to encourage you to approve the thoughtfully designed and staff recommended stealth wireless telecommunications "tree-pole" facility proposed to collocate up to five wireless carriers and to be located at 5080 Sagebrush Road in Garden Valley (the "Proposed Facility"). Given the substantial body of evidence that has been submitted to support approval of the Proposed Facility, we explain below the impact of federal law on your decision. In particular, we review the lack of "substantial evidence" to deny the Proposed Facility and how, even accepting the unsubstantiated claims of adverse impacts by adjacent neighbors, the Proposed Facility must be approved as the "least intrusive means" to fill an identified "significant gap" in Verizon Wireless coverage in El Dorado County (the "County").

Applicable Federal Law

SBA's client to occupy the Proposed Facility, Verizon Wireless, is licensed by the Federal Communications Commission ("FCC") to provide wireless telecommunications services in El Dorado County, and its authority to place wireless facilities in El Dorado County is governed by the Federal Telecommunications Act of 1996 (the "Telecommunications Act"). The Telecommunications Act, in turn, contains fundamental limits on the right of a local jurisdiction to regulate the placement of wireless facilities. Section 332 states:

No State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions.¹

In addition to pre-empting regulation on the basis of concerns over radio frequency emissions, the Telecommunications Act also:

- Requires the County to take final action on a permit application within a reasonable period of time;²
- Requires that any permit denial be in writing and based on substantial evidence in the record;³
- Prohibits unreasonable discrimination among competing wireless carriers;⁴ and
- Bars local regulation that would prohibit or have the effect of prohibiting the provision of personal wireless services.⁵

As we will explain, this application implicates at least two of these provisions.

A. Substantial Evidence

(i) Abundant Evidence for Approval

It is very clear from the Planning Commission Staff Report dated May 13, 2010, and included attachments (the "Staff Report") (recommending adoption of findings and mitigated negative declaration that approve the Proposed Facility), that substantial evidence has been provided by SBA, Verizon Wireless and third party consultants to allow the Planning Commission to approve a special use permit for the Proposed Facility.

Verizon Wireless coverage maps submitted to the County reveal a significant gap in wireless coverage in the Coloma, Lotus, and Garden Valley communities and Highway 49 corridor. SBA has designed and located the Proposed Facility to comply with all applicable provisions of the El Dorado County Zoning Ordinance, General Plan and the California

¹ 47 USC § 332(c)(7)(B)(iv).

² 47 USC § 332(c)(7)(B)(iii).

³ 47 USC § 332(c)(7)(B)(iii).

⁴ 47 USC § 332(c)(7)(B)(i)(I).

⁵ 47 USC § 332(c)(7)(B)(i)(II).

Environmental Quality Act (“CEQA”). A comprehensive alternatives analysis was performed prior to locating the Proposed Facility at 5080 Sagebrush Road. Thorough research of federal databases and ground review confirmed that no available structures or towers exist to provide needed cellular telephone service to Coloma, Lotus and Garden Valley. An extensive investigation of possible locations for a new facility resulted in the identification of the Sagebrush site as having the least impact to scenic corridors, historic sites and the local neighborhood while uniquely providing wireless service to the identified RF signal gap area. A copy of the SBA Site Alternatives Analysis (the “Alternatives Analysis”) is attached to this letter.

To fully mitigate any impacts from the Proposed Facility, it has been designed as a faux tree that will be placed within an enclosed equipment area that is fully screened by dark slatted fencing and an extensive landscape plan, all within required setbacks. Equipment locations have been rotated to ensure compliance with County noise standards (as confirmed by an independent report) and all precautions have been taken to confirm no impacts from lighting, access or dust. In all, Staff concludes that the Proposed Facility, with required mitigations, will fully comply with El Dorado County Zoning Ordinance requirements for a Special Use Permit as provided under Section 17.14.210 and that the Proposed Facility will have no significant aesthetic, noise, congestion or other environmental impacts on the community or neighborhood, in full compliance with CEQA. In turn, the stealth facility will provide needed wireless services to the entire Coloma, Lotus, and Garden Valley communities.

Following a thorough review of the necessary findings for approval for the Proposed Facility and insignificant environmental impacts, the Staff Report recommends adopting those findings and mitigated negative declaration to approve a Special Use Permit for the Proposed Facility.

(ii) “Substantial Evidence” Requirement for Denial under Federal Law

As noted above, the Telecommunications Act requires that any decision to deny a wireless facility must be in writing and supported by “substantial evidence.”⁶ A recurring opposition to the Proposed Facility has been neighbor concern over the health effects from RF emissions.⁷ Under federal law, such concerns are beyond the authority of the County and do not qualify as substantial evidence for denial where RF emissions comply with federal standards.⁸ To confirm compliance with federal standards, Verizon Wireless has provided the County with a radio frequency engineering analysis dated June 16, 2009 (the “RF Report”). The RF Report confirms that the Proposed Facility will operate well within (and actually far below) all

⁶ 47 USC § 332(c)(7)(B)(iii).

⁷ See neighbor correspondence.

⁸ 47 USC § 332(c)(7)(B)(iv).

applicable FCC public exposure limits.

The federal preemption regarding RF emissions applies whether the local decision is explicitly based on environmental effects, or through some proxy such as property values. A federal district court in California has held that in light of the federal preemption of RF regulation, "concern over the decrease in property values may not be considered as substantial evidence if the fear of property value depreciation is based on concern over the health effects caused by RF emissions." *AT&T Wireless Services of California LLC v. County of Carlsbad*, 308 F.Supp.2d 1148, 1159 (S.D. Cal. 2003)

The rest of any neighbor objections to the Proposed Facility are based upon subjective claims that the stealth tree pole design will pose significant and adverse aesthetic impacts and introduce noise, light and dust to their residential neighborhood. In truth, SBA has worked with staff to develop a design and identify a location that meets the aesthetic requirements of the County Zoning Ordinance and poses insignificant impacts to the community. To provide needed wireless telecommunications services, the Proposed Facility will be the subject of ongoing mitigation and maintenance requirements, including five-year reviews of compliance with all aesthetic requirements. The unmanned Proposed Facility, once constructed (in accordance with required dust mitigation plan), will require, at most, monthly checks by a technician in a van. All identified potential impacts from the unmanned and stealth design of the Proposed Facility are fully mitigated, and do not rise to the level of the substantial evidence required under federal law to deny needed wireless service to the Coloma/Lotus/Garden Valley area of El Dorado County. In any neighborhood, facilities that benefit the public, such as water tanks, telephone and light poles, will create minor impacts to adjacent neighbors while greatly benefiting the entire community. Such are the minor impacts of the Proposed Facility, which are fully mitigated by screening, setbacks and camouflage.

In sum, while sufficient evidence has been provided for staff to conclude that the Proposed Facility can be approved, only subjective concerns have been voiced by neighbors, and no "substantial evidence" has been presented that would justify denial of a Special Use Permit for the Proposed Facility as required by federal law.

B. Prohibition of Service Under Federal Law

As we explain below, under controlling federal case law, even where there may be substantial evidence to deny a site (e.g. due to aesthetics), a local authority is pre-empted from denying the application once a wireless service provider has established (a) a significant gap in signal coverage, and (b) that the proposed antenna facility is the "least intrusive means" to fill

that gap based upon the land use values embodied in local regulation.⁹ The courts have clarified that the applicant need not show that a site is the “only” alternative to fill a signal gap, but rather that the site is equivalent to, or no more intrusive, than any other feasible site location.¹⁰ Once a provider has made a “prima facie” showing that a proposed facility is the least intrusive, the requirements for federal pre-emption have been satisfied. For the local jurisdiction to overcome this pre-emption, it must show that another alternative is both “feasible” and “less intrusive” than the proposed facility.¹¹

Significant Gap

SBA submitted detailed radio propagation coverage maps prepared by Verizon Wireless to show the significant gap in coverage in the Coloma, Lotus, Garden Valley, Highway 49 and American River areas of El Dorado County to be served by the Proposed Facility. Spotty or non-existent cellular coverage has been confirmed by residents, visitors, local businesses, and public safety personnel the latter of which have provided correspondence in support of the Proposed Facility (See attached correspondence from members of the El Dorado Sheriff’s office).

Least Intrusive Means

The identified gap in coverage, topography and distance from adjacent Verizon Wireless facilities leave little opportunity for alternative site locations for the Proposed Facility. There are no commercial structures or available collocation facilities or towers in the proposed coverage area. As detailed in the attached Alternatives Analysis, the 5080 Sagebrush location provides a unique elevated site for radio propagation that also allows the tree pole to be set back from the ridgeline on a topographic shelf. Further, the elevated site is unique in providing necessary coverage northwest and southeast along the Highway 49 corridor while remaining hidden from to the General Plan and Draft EIR identified County Scenic Resources and public scenic viewpoints.¹² Having identified the signal gap and shown the Proposed Alternative to be the least intrusive means to fill that gap of feasible alternatives, SBA has met the burden to pre-empt local regulation of the Proposed Facility. In such circumstances, the burden shifts to the County to provide substantial evidence that another alternative is feasible, will provide adequate signal coverage and would have less impacts than the Proposed Facility. See *T-Mobile USA, Inc. v. County of Anacortes*, 572 F.3d 987 (9th Cir. 2009).

⁹ See *MetroPCS, Inc. v. County & County of San Francisco*, 400 F.3d 715 (9th Cir. 2004).

¹⁰ *Ibid.*

¹¹ See *T-Mobile USA, Inc. v. County of Anacortes*, 572 F.3d 987 (9th Cir. 2009).

¹² See discussion in attached Alternatives Analysis.

El Dorado County Planning Commission
May 11, 2010

Page 6 of 6

Conclusion

SBA and Verizon Wireless have provided substantial evidence in the form of coverage maps, photo-simulations, acoustic analysis, an RF report and the attached Alternatives Analysis to make all necessary findings for approval of the Proposed Facility. The conclusions of the Staff Report confirm that the Proposed Facility's stealth tree-pole design, with screened equipment area and site landscaping, fulfill the values reflected in the El Dorado County Zoning Ordinance and General Plan, and, as such, is the least intrusive means to fill the clearly defined coverage gap. The Proposed Facility will include the latest wireless technology, including high-speed data, voice and E911 call pinpointing capabilities, while the site will allow collocation of up to four other wireless carriers. El Dorado County residents, service providers, visitors and public safety professionals require the enhanced wireless coverage that will be provided by the Proposed Facility. We urge you to adopt the Mitigated Negative Declaration and grant a Special Use Permit for the Proposed Facility.

Very truly yours,

A handwritten signature in black ink, appearing to read "Paul Albritton", written in a cursive style.

Paul B. Albritton

Enclosures

Date 2/4/20

To whom it may concern,

This letter is in support of the installation of a cellular phone tower that will provide service to the Coloma Valley. I am a member of the law enforcement and emergency service community of El Dorado County. I believe that cellular phone service is essential to the safety and protection of the residents and visitors of Coloma as well as the commuters that travel through the valley daily.



Signature

WILLIAM WILSON

Printed Name

EL DORADO SHERIFF

Agency

300 FAIR LN. PLACER

Address


(530) 919-5337

Phone

Date 2.4.10

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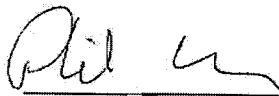

Signature

<u>M. HENSCHEL</u>	<u>EDSO</u>	<u>300 FOREN1 RD.</u>	<u>530-621-6011</u>
Printed Name	Agency	Address	Phone

Date 2-4-10

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Signature

SGT. <u>PAUL CHOVANEK</u>	<u>EL DORADO CO SO</u>	<u>300 FAIR LANE</u>	<u>748-7101</u>
Printed Name	Agency SHERIFF	Address <u>PLACERVILLE</u>	Phone

Date 2-4-10

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Signature

RICHARD HORN
Printed Name

E.D.S.O
Agency

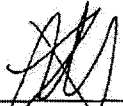
300 FRANK LN PLACERVILLE
Address CA

530-642-4715
Phone

Date 2/4/10

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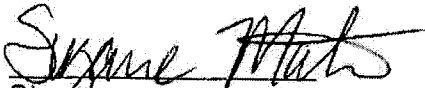
Signature

<u>LANCE BRYANT</u>	<u>EDSO</u>	<u>300 FAIRWAY, PLACERVILLE, CA</u>	<u>(530) 621-6600</u>
Printed Name	Agency	Address	Phone

Date 2-4-10

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Signature

SUZANNE MARTIN CA STATE PARKS PO BOX 222 (530) 363-8328
Printed Name Agency Address COLOMA, CA Phone

Alternatives Analysis

**SBA Network Services, Inc.
New Coloma Facility**

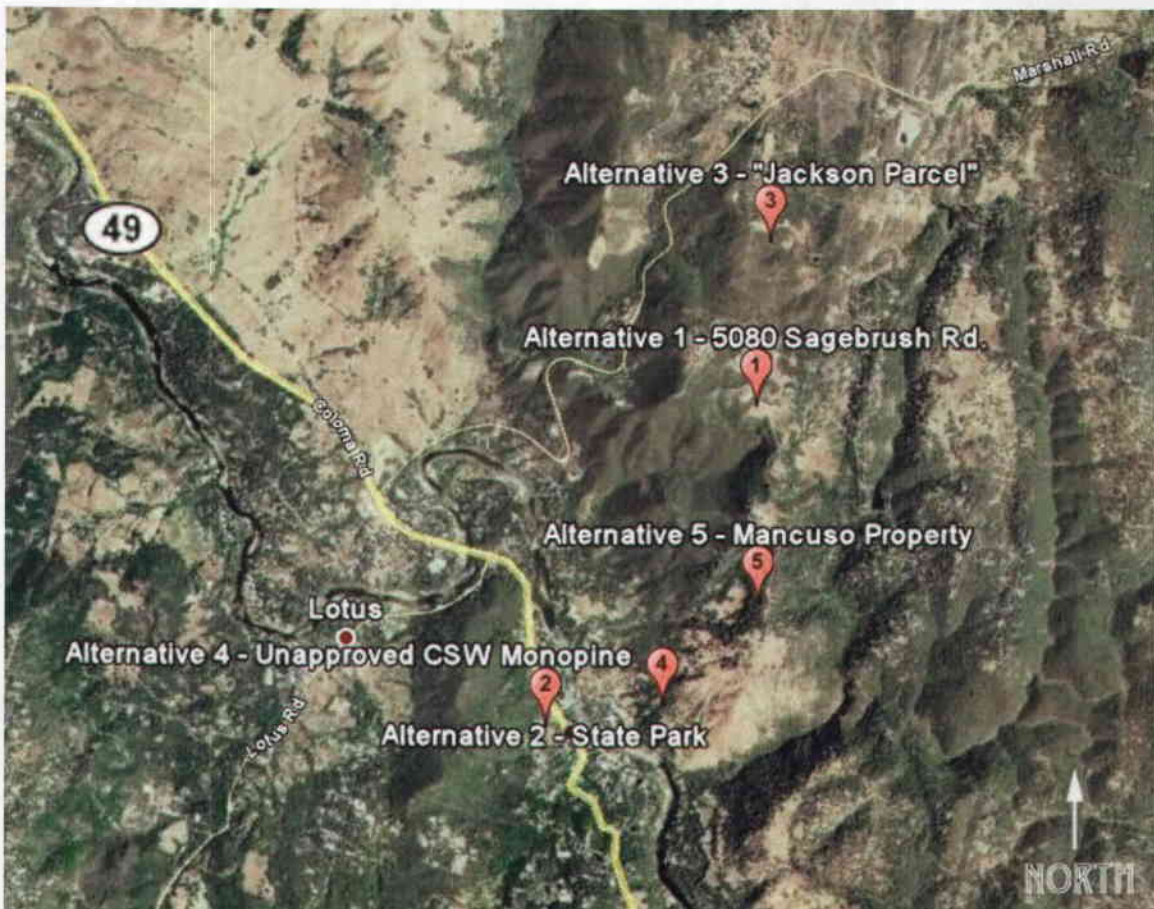
**CA11654
5080 Sagebrush Road, Garden Valley, CA**



**Dated
April 28, 2010**

Table of Contents

- I. Summary
- II. Objective
- III. Methodology
- IV. Analysis
- V. Conclusion



Aerial view of the five site locations that were considered for Coloma.

I. Summary

SBA Network Services, Inc. ("SBA") proposes to install a wireless telecommunications facility capable of hosting five wireless carriers at the property known as 5080 Sagebrush Road in Garden Valley, approximately 500 feet east of the intersection with Mt. Murphy road in the Garden Valley area (the "Proposed Facility"). The Proposed Facility will consist of a 100 foot structure disguised as a tree, a 60 foot by 90 foot radio equipment and back-up emergency generator area surrounded by a screened fence and landscaping that includes native foothill pine trees and shrubs. The Proposed Facility is designed to provide wireless voice and high-speed data service, as well as E911 emergency call locator service to a significant gap in Verizon wireless coverage. The coverage gap identified by Verizon Wireless generally includes the Highway 49 corridor through Coloma and the American River watercourse adjacent to Coloma, which is heavily populated by rafters during the spring and summer months and thousands of students and other tourists throughout the year. Located away from the County-identified public scenic viewpoints along Highway 49 through Coloma, and disguised as a tree, the Proposed Facility will have little or no impact on views from Coloma or adjoining neighbors while providing essential life saving wireless service to the Coloma, Lotus, and Garden Valley communities.

II. Objective

Verizon Wireless identified a significant gap in its wireless network along Highway 49 and including the communities of Lotus and Coloma. The gap identified by Verizon Wireless is shown on the coverage map attached as Exhibit A and generally includes the communities of Garden Valley, Lotus, and Coloma. The desired coverage area includes the Marshall Gold Discovery State Park, and several miles of State Highway 49 as well as Lotus Road. SBA seeks to locate and design a wireless facility that provides signal coverage to the identified gap utilizing means that minimize impacts to the Coloma and Garden Valley communities in accord with the values stated in the El Dorado County wireless code and general plan. In particular, SBA seeks to conform to the Values embodied in El Dorado County Code Section 17.14 .200 Communications Facilities, Wireless (the "Wireless Code"). In general, the Wireless Code places emphasis in the community value "to protect the scenic quality of El Dorado County's roads and byways". The Wireless Code encourages the "use of existing towers and structures", and where existing towers and structures are not available, the Wireless Code encourages the development of "joint use" and "multi-carrier" facilities to "reduce the number of towers county-wide". Furthermore, new facilities are to be "screened", "disguised", "painted to blend", and located so as to comply with required setbacks.

Community values regarding the placement of wireless facilities are also reflected in the El Dorado County General Plan, ordinances implementing the plan, and the Draft Environmental Impact Report ("DEIR") for the plan. These policy documents encourage the County to "establish scenic corridors" and "create a Scenic Corridor Plan" under Article 2 of the Code. While a Scenic Corridor Plan for Highway 49 has not been approved, the El Dorado County

General Plan Land Use Element Policy 2.6.1.3¹ provides for scenic protection for any development visible from the public scenic viewpoints identified in Table 5.3-1 and Exhibit 5.3-1. The relevant section of Table 5.3-1 is attached hereto as Exhibit B. SBA's overriding objective in site selection is to avoid impacts on identified County Scenic Resources along the Highway 49 corridor near historic sites in Coloma.

III. Methodology

SBA began its search for an appropriate site to fill the signal gap identified by Verizon Wireless in early 2008. The area in which the site can be located is primarily dictated by radio signal propagation from the proposed site over the intended coverage area and the location dependent, interrelationship of that coverage with existing facilities. Elevation is also an important factor to achieve equivalent coverage utilizing lower tower heights. These requirements limit the search area to a ring generally no more than one-quarter to one-half mile in diameter. As its first step in this process, SBA sought to identify any existing tower or structure that could accommodate the antenna and equipment requirements of Verizon Wireless. Available databases from the Federal Communications Commission ("FCC") and Federal Aviation Administration were researched and no available towers were identified by this process. In addition to database research, SBA conducted its own extensive field research to confirm that there are no existing towers or structures that could accommodate collocation² of the Verizon Wireless equipment. SBA's obligation to identify alternative site locations is fulfilled under the Wireless Code once SBA has demonstrated that there are, in fact, no available towers or structures for collocation. In seeking to identify a location for a new wireless facility, SBA sought willing landlords with property located outside of identified County Scenic Resources. In each case, SBA sought locations that would comply with County noise and setback requirements and that would minimize impacts on the adjacent neighborhood.

Existing towers or structures were identified. The nearest cell tower to the project is located on Mt. Ararat 4 miles northwest of Coloma, far from the proposed coverage area. Furthermore, this tower has no more capacity for collocation. Verizon Wireless has six antennas at the 37-foot level on this tower, however these antennas do not provide service into the Coloma area, thus the resulting signal gap to be filled in by the proposed location.

IV. Analysis

After balancing: (i) the radio propagation requirements of a limited search area that would; (ii) compliment existing facilities while; (iii) filling the desired coverage area with; (iv) community values of preserving identified scenic corridors, (v) utilizing elevation to minimize pole height; (vi) provision of a multi-carrier facility to minimize pole proliferation; (vii) provide for available access for vehicles, electricity and telephone service and; (viii) minimal impact on adjacent

¹ El Dorado County General Plan Land Use Element July , 2004 (amended December 2009) at page 41 (policy 2.6.1.3)

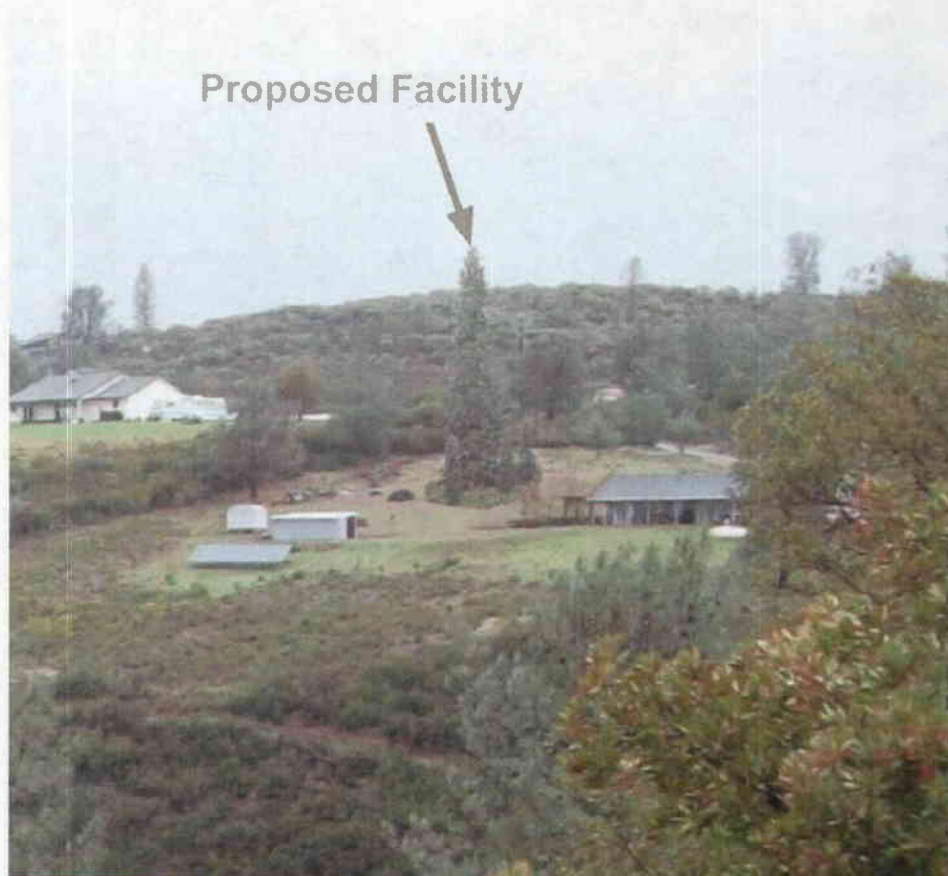
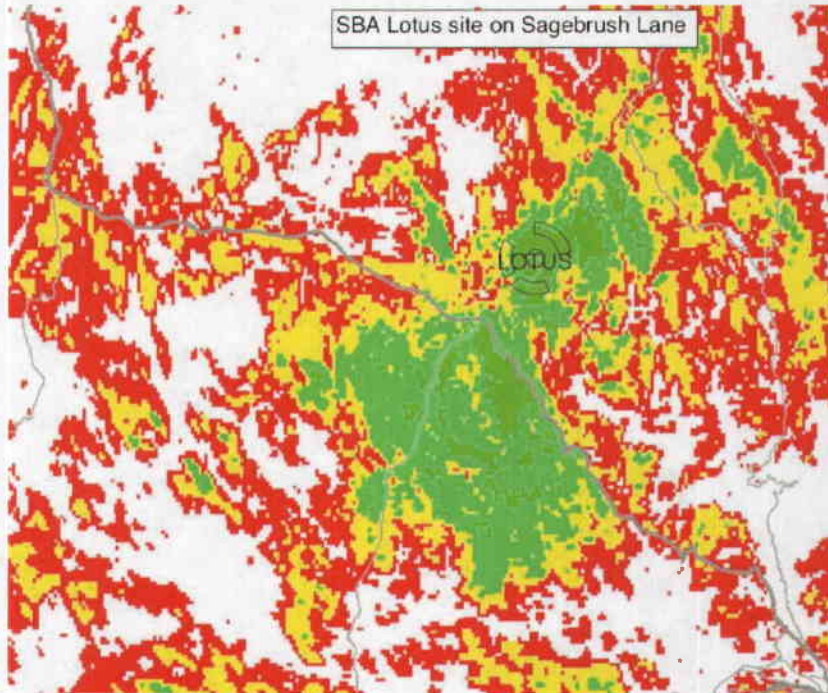
² See Wireless Ordinance Section 17.34

neighborhoods - only a few properties with willing landlords were identified. After a year of design coordination and cooperation with County staff and successful lease negotiations, the application for the Proposed Facility was submitted to the County on June 19, 2009. The sites that were considered include:

1) Proposed Facility

Located at 5080 Sage Brush Road, the Proposed Facility fulfills the requirements for SBA and Verizon Wireless and is least intrusive on the community resources identified in the Wireless Code and General Plan. The Proposed Facility location is on a topographically unique shelf above the Highway 49 corridor and the town of Coloma. The geographic shelf allows the stealth mono-pine tower to be set back into the hillside while still providing line of site coverage to the valley below. In addition, given its location, the Proposed Facility does not fall within an identified County Scenic Resource. Due to the preferred elevation of the site, the Proposed Facility will provide for joint use of five carriers on a 100 foot pole. At the same time, impacts to the immediate community are minimized through the use of the faux tree design, screened fencing, compliance with setbacks and sound ordinance requirements and a landscape plan. Construction impacts will be minimized in accordance with County Code through an asbestos dust mitigation plan and building code requirements related to construction schedules and noise.

A map showing the predicted coverage from the site and a photo simulation of the proposed tree pole follow.



2) State Park Candidate

The first candidate location investigated by SBA was Marshall Gold Discovery State Historic Park. The park Superintendent indicated a lack of interest in leasing to SBA. Also, the lower elevation of this location would require an excessively high tower to achieve necessary coverage. Finally, the Superintendent voiced serious concern over any facility that could be viewed from the historic park site.

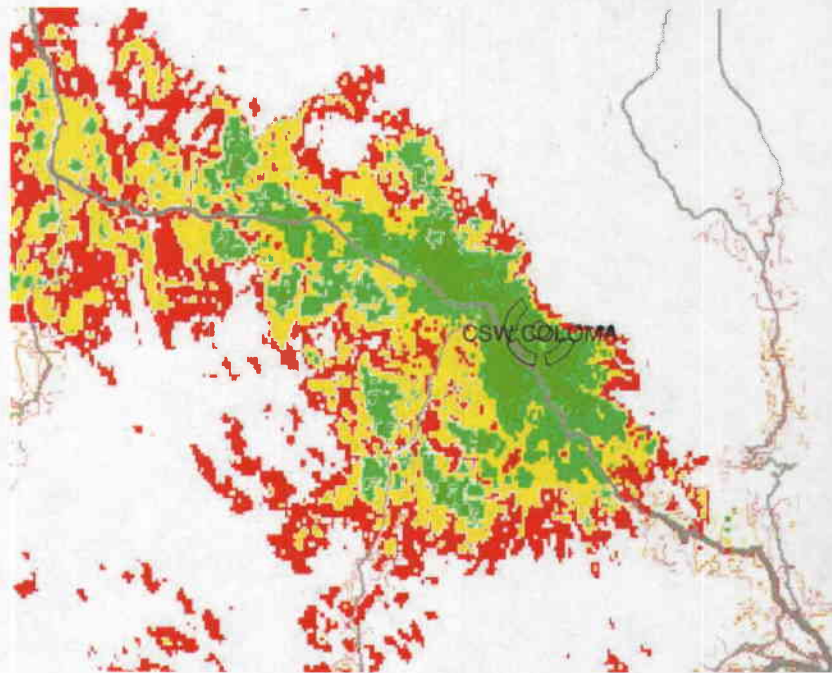


3) Jackson Parcel

This location would require a taller tower to achieve the same coverage as the proposed site due to a lot of flat ground between there and where the hill drops down to the coverage gap. This means that unless a tall tower is built, the “shoulder” of the hill will keep the signal from getting down into the Valley.

4) ComSites West Monopine

ComSites West (“CSW”) has an unapproved application to install a mono-pine communications structure at 6800 Mount Murphy Road, just across the river from the Marshall Gold Discovery State Park in Coloma. The ground elevation of the CSW site is just over 1000 feet, 700 feet lower than the Proposed Facility. Since cellular signals are generally considered to be line-of-sight, higher sites provide a larger coverage “footprint” than a similar facility located much lower in a valley. Specifically, the Proposed Facility would provide a much better signal to the community of Lotus, and a large portion of Lotus Road heading south toward Rescue than would the CSW site. In addition the CSW site provides little to no service in a northeast direction. The proposed site would provide several miles of new coverage for residents along Marshall Road, Mount Murphy Road, and Garden Valley Road. It would also enhance the level of existing service in Garden Valley. The lower elevation CSW site would provide none of these benefits. Finally, the CSW site and its proximity to the State Park falls within a County Scenic Resource.



5) Mancuso Property (two locations)

6401 Mt. Murphy 20 Acres – one site below ridge and one site above ridge. This property is highly visible from most of Coloma proper and is located within a listed County Scenic Resource (visible from important public scenic viewpoints identified in Table 5.3-1 of the DEIR attached as Exhibit B). One of the locations is in line of sight to the Coloma Historical areas on Hwy 49. The other requires a tall tower to provide the necessary coverage, and would be visible from the Sutter Mill Site along the river to the northwest and the newer commercial areas of Coloma west of "old town". Given these concerns, SBA had the site reviewed by an outside environmental consultant, Sims and Associates, LLC, who confirmed that there may be adverse environmental impacts due to the proximity of the site to historic resources. A copy of the Sims and Associates report is attached as Exhibit C. Additionally, Mount Murphy blocks both of these locations, so the Lotus coverage in that direction that is achieved by the proposed site is not realized by either of these locations.

V. Conclusion

SBA has worked diligently with staff over the past two years to identify a multi-carrier site that would fill the coverage requirements of Verizon Wireless, that meets all County Code requirements, and through thoughtful design and location minimizes impacts to the community. Through these efforts, SBA has identified the Proposed Facility as the least intrusive means to fill the significant gap identified by Verizon Wireless. Although the County Wireless Code only requires that SBA show that no alternative structures or towers are available for collocation of its proposed site, this Alternatives Analysis is provided to show that its investigation of feasible alternatives included a number of other potential tower locations, and that the selection of the Proposed Facility is based upon an understanding that the need to provide wireless services must be balanced with protection of County Scenic Resources and County values. Based upon these criteria, the Proposed Facility is the least intrusive means to fill the identified coverage area.

Existing Coloma area coverage

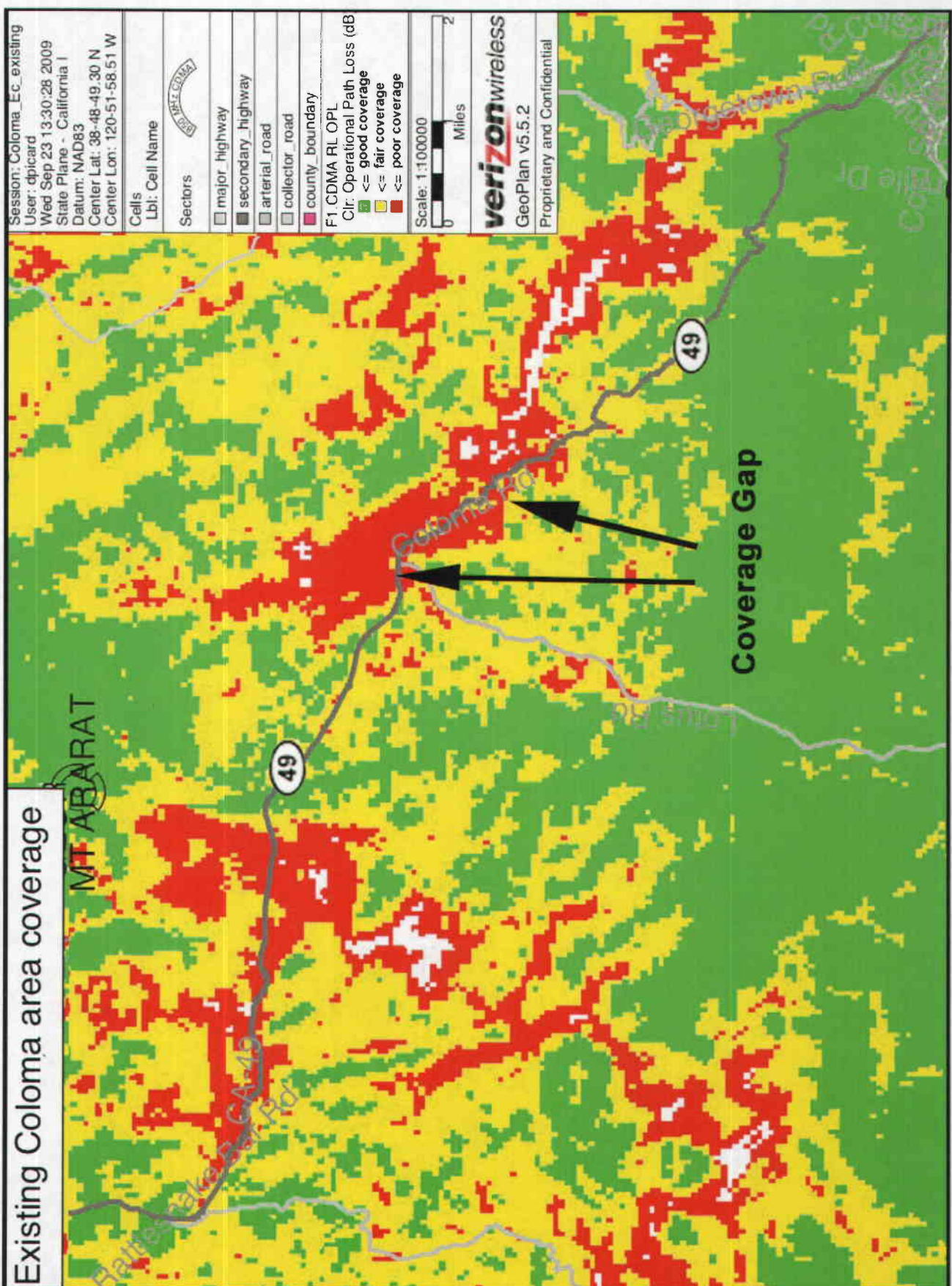


Exhibit A

**Table 5.3-1
Important Public Scenic Viewpoints**

Viewpoint	Location No. ¹	Location	Direction	Scenic View or Resource ²
Highways				
U.S. 50 westbound	1a	East of Bass Lake Road	South	Marble Valley (V)
	1b	Between South Shingle Road/ Ponderosa Road interchange and Greenstone Road	East	Crystal Range (V)
	1c	East of Placerville, various locations (state-designated scenic highway)	East, north, and south	Sierra Nevada peaks (V), American River canyon (V,R), lower Sierra Nevada ridgelines (V)
	1d	Echo Summit	East	Christmas Valley (V), Lake Tahoe (V,R)
U.S. 50 eastbound	2a	Between Echo Summit and Placerville (state-designated scenic highway)	West, north, and south	American River canyon (V,R), Sacramento Valley (V), lower Sierra Nevada ridgelines (V), Horsetail Falls (R)
	2b	Camino Heights	West	Sacramento Valley (V)
U.S. 49 northbound	2c	Bass Lake Grade	West	Sacramento Valley (V)
	3a	Coloma	All	Historic townsite of Coloma (Marshall Gold Discovery State Historic Park) (R)
	3b	Marshall Grade Road to Cool	East and west	Coloma Valley (V), American River (V,R), ridgelines (V), rolling hills (V)
U.S. 49 southbound	3c	North of Cool Quarry	North	Middle Fork American River Canyon (V,R)
	4a	Pedro Hill Road to Coloma	East and west	Coloma Valley (V), American River (V,R), Mt. Murphy (V,R), rolling hills (V)
	4b	Coloma	All	Historic townsite of Coloma (Marshall Gold Discovery State Historic Park) (R)
	4c	South of Crystal Boulevard	East and south	Cosumnes River canyon (V), ridgelines (V)



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March 19, 2010

SBA Network Services, Inc.
5900 Broken Sound Pkwy
Boca Raton, FL 33487

SUBJECT: Records Search Results for: CA-11654

Mr. Jon Rosenhack

Sims & Associates, LLC received and analyzed the documentation provided by the North Central Information Center of the California Historical Resources Information System (CHRIS) at the California State University in Sacramento on March 19th, 2010 pertaining to the proposed monopole location at 6401 Mt. Murphy Road, Garden Valley, CA 95633.

According to the records search there have been no previously recorded sites (historic or prehistoric) within the proposed 100 feet by 100 feet footprint APE. This records search also states that no previous cultural resources survey has been conducted in the project area as well. The CHRIS letter states that the prehistoric occupation period habitation sites in El Dorado County are primarily found adjacent to streams or on ridges or knolls, especially those with a southern exposure. The proposed project area is located on the terminus of a south trending ridge top knoll (Mt. Murphy). This physiographic landform has numerous saddles and overlooks Dutch Creek towards the south and the South Fork of the American River towards the west.

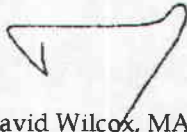
In accordance to literature (Gudde 1975) Coloma is named after a nearby Maidu Indian village, and is the location where James Marshall discovered gold at the site of Sutter's Mill in 1848, which is associated with the 1849er California Gold Rush. The town of Coloma is mostly a registered Historic District, which was added on the National Register of Historic Places in 1966. Although the Historic District is outside the ½ mile radius of the proposed undertaking, the district has one property (Mt. Murphy Road Bridge #25C-4/Coloma Steel Truss) that is listed on the California Register as a

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property determined eligible for National Register listing. The bridge's ROW extent is unknown, but likely lies within the South Fork of the American River's floodplain, therefore outside of the ½ visual APE.

Bing maps were studied and linear features following the contours of Mt. Murphy were seen. These are likely viaducts associated with hydrological mining and located within the ½ mile radius associated with the project area. Due to the location of the proposed property on Mt. Murphy, and proximity to the Sutter's Mill discovery/Historic District, Sims & Associates, LLC strongly suggest that a Phase I archaeological survey (100% pedestrian survey) be done to fully assess the project area, and that an archaeological monitor be present during the surface leveling and trenching associated with the construction phase of the project.

Respectfully,
Sims & Associates, LLC

A handwritten signature in black ink, appearing to read "David Wilcox". The signature is written in a cursive style with a large, sweeping initial "D".

David Wilcox, MA, RPA
Director of Cultural Resources

Cc: file